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UNITED STATES DISTRICT COURT
District of Nevada

UNITED STATES OF AMERICA,)	Case No.2:16-cr-00046-GMN-PAL-2
Plaintiff,)	
)	
v.)	PETITION FOR ACTION
)	ON CONDITIONS OF
RYAN C. BUNDY)	<u>PRETRIAL RELEASE</u>
Defendant)	

Attached hereto and expressly incorporated herein is a Petition for Action on Conditions of Pretrial Release concerning the above-named defendant prepared by Zack Bowen, Senior U.S. Pretrial Services Officer. I have reviewed that Petition, and I concur in the recommended action requested of the Court.

Dated this 22nd day of December, 2017.

STEVEN MYHRE
Acting United States Attorney

By /S/.
NADIA JANJUA AHMED
Assistant U. S. Attorney

**UNITED STATES DISTRICT COURT
for the
DISTRICT OF NEVADA**

U.S.A. vs. RYAN C. BUNDY

Docket No 2:16-cr-00046-GMN-PAL-2

Petition for Action on Conditions of Pretrial Release

COMES NOW ZACK BOWEN, SENIOR U.S. PRETRIAL SERVICES OFFICER, presenting an official report upon the conduct of defendant RYAN C. BUNDY. The defendant appeared before Your Honor on November 13, 2017, and was ordered released on a personal recognizance bond with the following conditions of release:

1. Pretrial Services Supervision.
2. Satisfy all outstanding warrants within 60 days and provide verification to Pretrial Services.
3. The defendant shall abide by all conditions of release of any current term of parole, probation, or supervised release.
4. Travel is restricted to Clark County, Nevada.
5. The defendant shall maintain residence at halfway house until residence is confirmed and may not move prior to obtaining permission from the Court, Pretrial Services or the supervising officer.
6. Maintain residence at a halfway house or community corrections center as directed by Pretrial Services, pay cost based upon ability to pay, and comply with all conditions of halfway house.
7. The defendant shall avoid all contact directly or indirectly with any person who is on the witness list.
8. The defendant shall avoid all contact directly or indirectly with co-defendant(s) unless it is in the presence of counsel.
9. Refrain from the use or possession of a firearm or destructive device or other dangerous weapons.
10. The defendant shall be monitored by the form of location monitoring indicated below and shall abide by all technology requirements. The defendant shall pay 100% of the cost of participation in the location monitoring program as directed by the Court and/or Pretrial Services Officer:

- Active GPS Monitoring

This form of location monitoring technology shall be utilized to monitor the following restriction on the defendant's movement in the community as well as other court-imposed conditions of release:

- The defendant is restricted to 24-hour-a-day lock-down except for medical necessities and court appearances or other activities specifically approved by the court, including religious services and meeting with counsel (Home Incarceration).
11. The defendant shall not tamper with, damage, ore remove the monitoring device and shall charge the said equipment according to the instructions provided by Pretrial Services or the supervising officer.

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On November 14, 2017, Your Honor ordered that the defendant's conditions of release be modified that he not have contact with anyone on the Government's witness list. On that same date, Your Honor ordered that the defendant's conditions of release be modified to include that the defendant must reside in a halfway house on 24-hour-a-day lock-down except for medical necessities, court appearances, to meet with counsel for co-defendants, to meet with stand-by counsel and for purposes of attending church.

On November 15, 2017, the defendant was permitted to move out of the halfway house and into his proposed residence in North Las Vegas, Nevada.

On November 16, 2017, the defendant requested and was approved to travel with the defense team on the condition that he keeps his Pretrial Services Officer apprised of his location and routes.

On November 20, 2017, the defendant requested that he be allowed to contact the following witnesses: Nathan Curtis, Douglas Gillespie, Joseph Lombardo, Shanan Kelly, and Dennis Michael Lynch. Your Honor ordered that the defendant may contact these individuals digitally but should he need to meet with any of these witnesses in person, he will need to do so at a Pretrial Services approved location, such as a law office.

On November 21, 2017, Your Honor ordered that the defendant may stay with his wife in her home in Mesquite, Nevada from 10:00 a.m. on Thursday, November 23, 2017, through Friday, November 24, 2017, at 10:00 a.m. The defendant was ordered to consult with his Pretrial Service Officer to ensure that he knows how to charge and transport his monitoring device prior to leaving town.

On November 28, 2017, the defendant requested and Your Honor ordered that his conditions of release be modified from Home Incarceration to a Curfew of 7:00 a.m. to 7:00 p.m.

On December 12, 2017, the defendant requested and Your Honor ordered that the conditions of release for the defendant, Ammon Bundy, and Ryan Payne be modified from Home Incarceration to a Curfew of 9:00 p.m. to 5:00 a.m. It should be noted that Ryan Payne was not permitted to be placed on a Curfew at that time due to the conditions of release as ordered in the District of Oregon that required he remain on Home Incarceration.

Respectfully presenting petition for action of Court and for cause as follows:

Based upon the defendant's representations that he needs to travel outside Clark County, Nevada for the purposes of work. Our office is requesting a modification of his travel restriction.

PRAYING THAT THE COURT WILL MODIFY THE DEFENDANT'S TRAVEL RESTRICTION TO THE FOLLOWING: 1) TRAVEL IS RESTRICTED TO CLARK COUNTY, NEVADA, UNLESS PREAPPROVED BY PRETRIAL SERVICES.

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ORDER OF COURT

Considered and ordered this ____ day of
December, 2017 and ordered filed and made a
part of the records in the above case.

Honorable Gloria M. Navarro, Chief
U.S. District Judge

I declare under penalty of perjury that the
information herein is true and correct. Executed
on this 22nd day of December, 2017.

Respectfully Submitted,



Zack Bowen
Senior U.S. Pretrial Services Officer
Place: Las Vegas, Nevada

